Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137

Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0182-20-F Plant ID: 0182

Effective Date: 03/31/2020 Expiration Date: 03/31/2025

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Source: IMI South, LLC - South
1440 Selinda Avenue
Louisville, KY 40213

Owner: IMI South, LLC
1440 Selinda Avenue
Louisville, KY 40213

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve months and no later than ninety days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: PM_{10}
Tons/year: 25

Application No.: See **Application and Related Documents** table.
Public Notice Date: 02/28/2020

Permit writer: Aaron DeWitt

Air Pollution Control Officer
3/31/2020

Table of Contents

Permit Revisions and Changes

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
O-0182-15-F	01/16/2015	02/17/2015	Initial	Initial Permit Issuance
O-0182-20-F	02/28/2020	03/31/2020	Renewal	Renewal, update format, removed greenhouse gas limits from general condition 10

Construction Permit Summary

Permit No.	Issue Date	Description
232-72-C	07/27/1972	Operation of concrete batch plant, reference 233-72-O
305-73-C	03/27/1973	Installation of dust collector, replaces collector in permit 237-72-O
150-84-C	08/30/1984	Four (4) bag filters servicing the cement silo, the flyash silo, the batcher, and the mixer
149-84-C	08/30/1984	Concrete batching operation
30-86-C	03/31/1986	Concrete batch plant, Heltzel, model no. 900 C
31-86-C	03/31/1986	Two (2) baghouses, Stephens, model SV-170
92-86-C	05/30/1986	Pneumatic conveying system to convey cement
93-86-C	05/30/1986	Pneumatic conveying system to convey flyash
71-88-C	09/01/1987	Installation of dust collector for cement transfer
72-88-C	09/01/1987	Baghouse, Stephens, model SV-170 for flyash transfer
494-91-C	10/16/1991	Baghouse, Stephens, model SU-45 for dust capture form Besser mixer
99-92-C	02/17/1992	Concrete batch plant, Heltzel 900C
100-92-C	02/17/1992	Two (2) baghouses, Stephens, model SV-170. One (1) baghouse, Dusty Dustless 36I
264-03-C	07/30/2003	Cartridge filter dust collector, Stephens, model SOS6100
221-06-C	07/31/2006	Operation consisting of transporting aggregate by rail via a conveyor to a truck

Application and Related Documents

Document Number	Date	Description
119585	09/30/2019	District email reminder of expiring permits, 60 days until applications due
126073	12/10/2019	District email requesting overdue application for permit renewal
126160	12/12/2019	IMI application question
126262	12/12/2019	District response
126161	12/12/2019	IMI application question
126162	12/12/2019	District response
126163	12/12/2019	IMI application question
126164	12/12/2019	District response, new applications required
126246	12/13/2019	IMI submitted applications via email

Abbreviations and Acronyms

AP-42	- AP-42, *Compilation of Air Pollutant Emission Factors, published by U.S.EPA*
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
(M)SDS	- (Material) Safety Data Sheet
NAICS	- North American Industry Classification System
NO_x	- Nitrogen oxides
PM	- Particulate Matter
PM_{10}	- Particulate Matter less than 10 microns
$PM_{2.5}$	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO_2	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.

G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.

G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.

G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.

G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.

G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.

G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.

G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.

G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM_{10}, $PM_{2.5}$, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.

G12. Unless specified elsewhere in this permit, the owner or operator shall submit semi-annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All compliance reports shall include the following per Regulation 2.17, section 3.5.

- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
- The signature and title of a responsible official of the company.

- The semi-annual compliance reports are due on or before the following dates of each calendar year:

Reporting Period	**Report Due Date**
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year

G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.06	Permit Requirements – Other Sources
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.

G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.

G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

Air Pollution Control District
701 W. Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137

Emission Unit U1: Concrete Batch Plant

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
1.14	Control of Fugitive Particulate Emissions	All
2.17	Federally Enforceable District Origin Operating Permit	All
6.09	Standards of Performance for Existing Process Operations	1, 2, and 3
7.08	Standards of Performance for New Process Operations	1, 2, and 3

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.00	Definitions	1, 2

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E1	Cement Silo #001, capacity 100 tons	2003	7.08	C1	S1
E2	Cement Silo #002, capacity 100 tons	2003		C1	S1
E3	Flyash Silo #003, capacity 100 tons	2003		C1	S1
E4	Flyash Silo #004, capacity 100 tons	2003		C1	S1

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E5	Aggregate/sand weigh hopper, capacity 412 tons/hr	1973	6.09	C1	S1
E6	Cement/Flyash Weigh Hopper, capacity 70.5 ton/hr	1973		C1	S1
E7	Mixer loading, capacity 500 ton/hr	1973		C1	S1
E8	Aggregate stockpiles	1973	1.14	N/A	N/A
E9	Sand stockpiles	1973		N/A	N/A
E10	Aggregate/sand handling	1973		N/A	N/A
E11	Aggregate/sand transfer conveyor, capacity 412 ton/hr	1973		N/A	N/A
E12	Aggregate/sand bins, capacity 412 ton/hr	1973	1.14	N/A	N/A
E14	Two (2) aggregate/sand bins, loading, conveyors, capacity 240 ton/hr each	1973		N/A	N/A
E15	Aggregate/sand conveyor loading, five (5) hoppers, capacity 240 ton/hr	1973		N/A	N/A

Control Devices

Control ID	Description	Control Efficiency
C1	Central Dust Collection System, make Stephens, model SOS6100 baghouse, capacity 8,000 cfm	98%

Equipment Not Regulated

Emission Point	Description
E13	Roads & Yard[1]

[1] IMI South, LLC – Selinda is not one of the 28 source categories where roads and yards have standards.

U1 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. Opacity

i. The owner or operator of emission points E5, E6, and E7 shall not allow visible emissions to equal or exceed 20% opacity. [Regulation 6.09, section 3.1]

ii. The owner or operator of emission points E1, E2, E3, and E4 shall not allow visible emissions to equal or exceed 20% opacity. [Regulation 7.08, section 3.1.1]

b. PM/PM_{10}

i. The owner or operator shall not allow the total plantwide emissions of the pollutant PM_{10} to equal or exceed twenty-five (25.0) tons per twelve (12) consecutive month period.[2] [Regulation 2.17, section 5.1]
[Regulation 5.00, section 1.13.5]

ii. The owner or operator shall not allow the total plantwide emissions of the pollutant PM to equal or exceed twenty-five (25.0) tons per twelve (12) consecutive month period. [Regulation 5.00, section 1.13.5]

iii. The owner or operator, for emission points E1, E2, E3, and E4 combined, shall not allow or cause the particulate emissions to exceed the permitted limitations of 32.52 pounds per hour for the concrete batch plant.
[Construction Permit 264-03-C, effective 7/30/2003]

iv. The owner or operator, for emission points E1, E2, E3, and E4 combined, shall not allow or cause the particulate emissions to exceed the permitted limitations of 27.38 tons per year for the concrete batch plant.
[Construction Permit 264-03-C, effective 7/30/2003][3]

v. The owner or operator shall not allow PM emissions from the aggregate/sand weigh hopper, emission point E5, to exceed 66.66 lb/hr, based on actual operating hours on a calendar day.[4]
[Regulation 6.09, section 3.2]

---

[2] The source requested the total plantwide limits of the criteria pollutants PM_{10} < 25 ton/yr, Total HAPs < 12.5 ton/yr and largest single HAP < 5.0 ton/yr to be a FEDOOP STAR Exempt source as defined by Regulation 5.00, section 1.13.5, on 3/14/14.

[3] As the source as requested a PM limit of less than 25 ton/yr this limit can not be exceeded.

[4] Emissions calculations used emission factors from AP-42, table 11.12-2 and table 11.12-8. Uncontrolled emissions for the pollutant PM do not exceed the standard.

vi. The owner or operator shall not allow PM emissions from the cement/flyash weigh hopper, emission point E6, to exceed 47.77 lb/hr, based on actual operating hours on a calendar day. [4][Regulation 6.09, section 3.2]

vii. The owner or operator shall not allow PM emissions from the central mixer loading, emission point E7, to exceed 69.03 lb/hr, based on actual operating hours on a calendar day. [4][Regulation 6.09, section 3.2]

viii. For emission points E8, E9, E10, E11, E12, E14, and E15, the owner or operator shall not allow any materials to be handled, transported or stored; or access roads to and from the plant site, roads on the plant site property and the on-site work areas of the plant site, to be used without taking reasonable precautions to prevent particulate matter from becoming airborne beyond the work site. [Regulation 1.14, section 2.1]

ix. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. [Regulation 1.05, section 5]

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

i. The owner or operator shall, monthly, conduct a one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys may be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

iii. The owner or operator shall, monthly, maintain records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

b. PM/PM_{10}

i. The owner or operator shall, daily, maintain records of any periods of time where the process, E1, E2, E3, and E4 were operating and the control device was not operating or a declaration that the control device operated at all times that day when the process was operating.

ii. If there is any time that the control device is bypassed or not in operation when the process E1, E2, E3, and E4 are operating, then the owner or operator shall keep a record of the following for each bypass event:

(1) Date;

(2) Start time and stop time;

(3) Identification of the control device and process equipement;

(4) PM emissions during the bypass in lb/hr;

(5) Summary of the cause or reason for each bypass event;

(6) Corrective action taken to minimize the extent or duration of the bypass event; and

(7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

iii. The owner or operator shall, monthly, perform a visual inspection of the structural and mechanical integrity of the dust collector for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.

iv. The owner or operator shall, monthly, maintain records of the below listed items:

(1) The monthly and the monthly twelve (12) consecutive month period totals of cubic yards of concrete produced.

(2) The owner or operator shall calculate and record, during the first thirty calendar days of the following month, the monthly twelve (12) consecutive month plantwide total emissions of the pollutants PM and PM_{10}. All totals shall include PM and PM_{10} emitted during control bypasses.

(3) The owner or operator shall use the below listed, AP-42, Concrete Batching, emission factors when calculating the controlled plantwide emisions for the pollutant PM_{10}, or other emission factors that become available, as approved by District. [5]

Table 1 AP-42 Controlled Emission Factors

Equipment	**AP-42 Emission Factor, Controlled lb PM_{10}/ton**	**Controlled PM_{10} Emission Factor converted to lb PM_{10}/yd^3 dry concrete**
Aggregate Transfer	0.0033	0.0031
Sand Transfer	0.00099	0.0007
Weigh hopper (Agg+Sand)[a]	0.00014	0.00023
Mixer loading (cement+flyash)[b]	0.0055	0.0016
Cement silo filling	0.00034	0.00008
Flyash silo filling	0.0049	0.0002
Aggregate ground storage	N/A	0.0031
Sand ground storage	N/A	0.0007
Aggregate hopper loading	N/A	0.0031
Sand hopper loading	N/A	0.0007

(4) The owner or operator shall use the below listed AP-42, Concrete Batching, emission factors when calculating the uncontrolled plantwide emissions for the pollutant PM_{10}, or other emission factors that become available, as approved by District. [5]

Table 2 AP-42 Uncontrolled Emission Factors

Equipment	**AP-42 Emission Factor, Uncontrolled lb PM_{10}/ton**	**Uncontrolled PM_{10} Emission Factor converted to lb PM_{10}/yd^3 dry concrete**
Aggregate Transfer	0.0033	0.0031
Sand Transfer	0.00099	0.0007
Weigh hopper (Agg+Sand)[a]	0.0028	0.0046
Mixer loading (cement+flyash)[b]	0.156	0.044
Cement silo filling	0.47	0.1152
Flyash silo filling	1.10	0.0402
Aggregate ground storage	N/A	0.0031
Sand ground storage	N/A	0.0007
Aggregate hopper loading	N/A	0.0031
Sand hopper loading	N/A	0.0007

[a] The unit for weigh hopper emission factor is lb of pollutant per ton of aggregate and sand, AP-42, table 11.12-2, footnote e.

[b] The unit for central mixer loading emission factor is lb of pollutant per ton of cement and flyash, AP-42, table 11.12-2, footnote f.

[5] The PM/PM_{10} emissions factors are from or were derived from AP-42, Chapter 11.12, Concrete Batching, tables 11.12-2 and 11.12-8, and the standard concrete mix proportions listed in AP-42, chapter 11.12.

(5) The owner or operator shall use the below listed, AP-42, Concrete Batching, emission factors when calculating the controlled plantwide emisions for the pollutant PM, or other emission factors that become available, as approved by District. [6]

Table 3 AP-42 Controlled Emission Factors

Equipment	**AP-42 Emission Factor, Controlled lb PM/ton**	**Controlled PM Emission Factor converted to lb PM/yd^3 dry concrete**
Aggregate Transfer	0.0069	0.0063
Sand Transfer	0.00021	0.0015
Weigh hopper (Agg+Sand)[a]	0.00024	0.0004
Mixer loading (cem+cem suppl)[b]	0.0184	0.0052
Cement silo filling	0.00099	0.00024
Flyash silo filling	0.0089	0.0003
Aggregate ground storage	N/A	0.0064
Sand ground storage	N/A	0.0015
Aggregate hopper loading	N/A	0.0064
Sand hopper loading	N/A	0.0015

(6) The owner or operator shall use the below listed AP-42, Concrete Batching, emission factors when calculating the uncontrolled plantwide emissions for the pollutant PM, or other emission factors that become available, as approved by District. [6]

Table 4 AP-42 Uncontrolled Emission Factors

Equipment	**AP-42 Emission Factor, Uncontrolled lb PM/ton**	**Uncontrolled PM Emission Factor converted to lb PM/yd^3 dry concrete**
Aggregate Transfer	0.0069	0.0063
Sand Transfer	0.00021	0.0015
Weigh hopper (Agg+Sand)[a]	0.0048	0.0079
Mixer loading (cement+flyash)[b]	0.572	0.161
Cement silo filling	0.73	0.179
Flyash silo filling	3.14	0.116
Aggregate ground storage	N/A	0.0064
Sand ground storage	N/A	0.0015
Aggregate hopper loading	N/A	0.0064
Sand hopper loading	N/A	0.0015

[a] The unit for weigh hopper emission factor is lb of pollutant per ton of aggregate and sand, AP-42, table 11.12-2, footnote e.

[b] The unit for central mixer loading emission factor is lb of pollutant per ton of cement and flyash, AP-42, table 11.12-2, footnote f.

[6] The PM/PM$_{10}$ emissions factors are from or were derived from AP-42, Chapter 11.12, Concrete Batching, tables 11.12-2 and 11.12-8, and the standard concrete mix proportions listed in AP-42, chapter 11.12.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. Opacity

i. The date, time, and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration.

ii. The date, time and results of each Method 9 test conducted. If there were no Method 9 tests performed during the reporting, the owner or operator may submit a negative declaration.

iii. Description of any corrective action taken for each exceedance of the opacity standard.

b. PM/PM_{10}

i. The owner or operator shall report the monthly twelve (12) consecutive month period totals of plantwide emissions of the pollutant PM10. All totals shall include PM10 emitted during control bypasses.

ii. The owner or operator shall report the monthly twelve (12) consecutive month period totals of plantwide emissions of the pollutant PM. All totals shall include PM emitted during control bypasses.

iii. The owner or operator shall report the following information regarding each emission points, E1, E2, E3, and E4, PM bypass Activity in the annual compliance reports:

(1) Emission point at which the bypass occurred;

(2) Date and duration (including the start and stop time) during which a bypass occurred:

(3) The average PM lb/hr emitted at each emission point during the bypass;

(4) Summary information on the cause or reason for the bypass activity;

(5) Corrective action taken to minimize the extent and duration of each bypass event;

(6) Measures implemented to prevent reoccurrence of the situation that resulted in bypass emissions; or

(7) If no deviations occur during the annual reporting period, the report shall contain a negative declaration.

Insignificant Activities

Equipment	Qty.	PTE (ton/yr)	Regulation Basis
Tanks for storage of lubricating oils or fuels oils, with vapor pressure less than 10 mmHg at conditions of 20 °C and 760 mmHg. (See unit IA1 – Tanks- T1 thru T4)	4	0.03 VOC	Regulation 1.02, Appendix A
3.3 MMBtu natural gas fueled water heater (See unit IA2 – Indirect-fired Heat Boiler)	1	1.42 NO_X	Regulation 1.02, Appendix A
Brazing, soldering or welding equipment	1	0.41 PM	Regulation 1.02, Appendix A
Waste oil heater	1	0.38 SO_2	Regulation 1.02, section 1.38

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.

2. Insignificant activities identified in District Regulation 1.02, Appendix A, shall comply with generally applicable requirements.

3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.

4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.

5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.

6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

Equipment Not Regulated

Emission Point	Description
IA Tanks	Four (4) VOC storage tanks, each with a maximum capacity of 250 gallons or less, for storing engine oil, gear oil, hydraulic oil, and transmission fluid
E13	Roads & Yard

Emission Unit IA1: Tanks

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
T1	19,000-gallon tank, used for diesel fuel	1993	7.12	N/A	N/A
T2	500-gallon tank, make Hoover Containment Inc., model M-643824	1993		N/A	N/A
T3	1,000-gallon tank	1993		N/A	N/A
T4	500-gallon tank	1993		N/A	N/A

Control Devices

There are no control devices associated with this equipment.

Equipment Not Regulated

Emission Point	Description
IA Tanks	Four (4) VOC storage tanks, each with a maximum capacity of 250 gallons or less, for storing engine oil, gear oil, hydraulic oil, and transmission fluid

IA1 Specific Conditions

S1. Standards
[Regulation 2.17, section 5.1]

a. VOC

i. The owner or operator shall not store materials with an as stored vapor pressure of greater than or equal to 1.5 psia in the storage vessel(s), unless the storage tank is equipped with a permanent submerged fill pipe. [Regulation 7.12, section 3.3]

S2. Monitoring and Record Keeping
[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. VOC

i. The owner or operator of the storage vessel(s) shall maintain records of the material stored and the vapor pressure in each storage vessel and if the contents of the storage vessel(s) are changed a record shall be made of the new contents, the date of the change, and the new vapor pressure in order to demonstrate compliance with VOC standards.

ii. The owner or operator shall keep a record that shows if the storage vessel is equipped with a submerged fill pipe. Submerged fill pipe means any fill pipe the discharge of which is entirely submerged when the liquid level is 6 inches above the bottom of the tank; or when applied to a tank which is loaded from the side, shall mean every fill pipe the discharge opening of which is entirely submerged when the liquid level is 2 times the fill pipe diameter above the bottom of the tank.

S3. Reporting
[Regulation 2.17, section 5.2]

The owner or operator shall report in accordance with General Condition G12.

Emission Unit IA2: Indirect-fired Heat Boiler

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
7.06	Standards of Performance for New Indirect Heat Exchangers	1 through 5

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E16	Indirect heat natural gas boiler, make Williams & Davis, model 777, capacity 3.3 MMBtu/hr	1996	7.06	N/A	N/A

Control Devices

There are not control devices associated with this equipment.

IA2 Specific Conditions

S1. Standards
[Regulation 2.17, section 5.1]

a. Opacity

i. The owner or operator shall not cause to be discharged into the atmosphere from any affected facility particulate matter emissions which exhibit greater than 20% opacity. [Regulation 7.06, section 4.2]

b. PM

i. The owner or operator shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.56 pounds per million BTU total heat input.[7] [Regulation 7.06, section 4.1.1]

c. SO_2

i. The owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur dioxide in excess of 1.0 pounds per million BTU actual total heat input for combustion of liquid and gaseous fuels. [7] [Regulation 7.06, section 5.1.1]

S2. Monitoring and Record Keeping
[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

i. There are no monitoring or record keeping requirements for Opacity compliance.[8]

b. PM

i. There are no monitoring or record keeping requirements for PM compliance. [7]

[7] A one-time PM and SO_2 compliance demonstration has been performed using AP-42 emission factors. The emission standards cannot be exceeded when combusting natural gas.
[8] The District has determined that using a natural gas fired boiler should inherently meet the 20% opacity standard.

c. SO_2

i. There are no monitoring or record keeping requirements for SO_2 compliance. [7]

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report in accordance with General Condition G12.

Attachment A - Protocol Checklist for a Performance Test

A complete protocol must include the following information

1. Facility name, location, and Plant ID number.
2. Responsible Official and environmental contact names.
3. Permit numbers that are requiring the test to be conducted.
4. Test methods to be used (*i.e.* EPA Method 1, 2, 3, 4, and 5).
5. Alternative test methods or description of modifications to the test methods to be used.
6. Purpose of the test including equipment and pollutant to be tested. (The purpose may be described in the permit that requires the test to be conducted or it may be to show compliance with a federal regulation or emission standard.)
7. Tentative test dates. (These may change but final notice is required at least 10 days in advance of the actual test dates in order to arrange for observation.)
8. Maximum rated production capacity of the system.
9. Production-rate goal planned during the performance test for demonstration of compliance (if appropriate, based on limits) and justification of the planned production rate, if less than the maximum rate.
10. Method to be used for determining rate of production during the performance test.
11. Method to be used for determining rate of production during subsequent operations of the process equipment to demonstrate compliance.
12. Description of normal operation cycles, if applicable.
13. Discussion of operating conditions that tend to cause worse case emissions. This is especially important to clarify if worst case emissions do not result from the maximum production rate.
14. Process flow diagram.
15. The type and manufacturer of the control equipment, if any.
16. The process and/or control equipment parameters to be monitored and recorded during the performance test. These parameters may include pressure drops, flow rates, pH, temperature, *etc*. The values achieved during the test may be required during subsequent operations to describe the operating parameters that are indicative of good operating performance.
17. How quality assurance and accuracy of the data will be maintained, including sample identification and chain-of-custody procedures, audit sample provider, and number of audit samples to be used, if applicable.
18. Diameter of the pipe, duct, stack, or flue to be tested.
19. Distances from the testing sample ports to the nearest upstream and downstream flow disturbances such as bends, valves, constrictions, expansions, and exit points for outlet and additionally for inlet.
20. The number of traverse points to be tested for the outlet and the inlet if required, using Method 1 in Appendix A-1 to 40 CFR Part 60.

The Stack Test Review fee must be submitted with each stack test protocol.

The current fee is listed on the APCD website (louisvilleky.gov/APCD)

Fee Comment

1. The company is required to pay annual fees.